FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT

AND

ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

Ertel Manufacturing Corporation 2045 Dr. Andrew J. Brown Avenue Indianapolis, Indiana 46202

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

Operation Permit No.: F097-5572-00057

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date: July 23 rd , 1997
First Minor Permit Revision: F097-12379-00014	Affected Pages: 8,42,46
Issued by:	Issuance Date:
Mona A. Salem, Chief Operating Officer, Department of Public Works, City of Indianapolis	

- (f) A pickup hood to collect emissions from the loading of the tumbleblast machine (F-6). The tumbleblast machine has a maximum unit capacity of 4 tons of metal per hour. Part of this facility is covered under emission unit F-5C. The particulate emissions are controlled by a baghouse which exhausts out one stack identified as S-6.
- (g) One (1) mop water evaporator, identified as EU-F-8. The mop water evaporator has a maximum capacity of 30 gal/hr, with no control equipment, and exhausts to stack F-7.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than 10 million (10,000,000) Btu per hour. The facilities under this category consist of two (2) 4.4 million Btu per hour natural gas-fired boilers;
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluid.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Closed loop heating and cooling system.
- (g) Noncontact cooling tower system with forced and induced draft cooling tower system not regulated under a NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in any other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (k) Grinding operations with potential PM emissions less than 25 pounds per day. Based on AP-42 emissions factors the potential emissions from this operation are 9.6 pounds per day.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Environmental Resources Management Division (ERMD), Air Quality Management Section (AQMS) and Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

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Permit Reviewer: Kevin Leone **SECTION D.8**

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) mop water evaporator, identified as EU-F-8. The mop water evaporator has a maximum capacity of 30 gal/hr, with no control equipment, and exhausts to stack F-7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compound Rules, New Facilities [326 IAC 2-8-11.1] [326 IAC 8-1-6]

The allowable VOC emissions from the mop water evaporator have been limited to less than 25 tons per year, thus 326 IAC 8-1-6 is not applicable. This will be done by limiting the operating hours of the mop water evaporator to 4,645 hours per year.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

D.8.3 Volatile Organic Compounds (VOC)

Compliance with condition D.8.1 shall be determined based on semi-annual mop water evaporator hours of operation.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.8.4 Record Keeping Requirements

- (a) To document compliance with Condition D.8.1and D.8.3, the Permittee shall maintain a log of semi-annual hours of operation for the mop water evaporator.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.8.5 Reporting Requirements

A semi-annual summary of the information to document compliance with condition D.8.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported.

Indianapolis, Indiana Permit Reviewer: Kevin Leone

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Ertel Manufacturing Division, Dyna Gear

Source Address: 2045 Dr. Andrew J. Brown Ave. Mailing Address: 2045 Dr. Andrew J. Brown Ave.

FESOP No.: F097-5572-00057 Facility: Mop Water Evaporator

Parameter: Volatile Organic Compound Emissions

Limit: 4,645 hours of operation per year. This equates to less than 25 tons emission of VOC

per year for the mop water evaporator (EU-F-8).

YEAR:	

	Column 1	Column 2	Column 1 + Column 2
Emission Unit	Hours of operation last 6 months	Hours of operation previous 6 months	12 Month Total
EU-F-7			

9No deviation occurred in this quarter.

	on/s occurred in this quarter. on has been reported on:
Submitted by:	

Indiana Department of Environmental Management Office of Air Management and Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Minor Permit Revision to a FESOP

Source Background and Description

Source Name: Ertel Manufacturing Division, Dyna Gear Source Location: 2045 Dr. Andrew J. Brown Avenue

County: Marion SIC Code: 3321

Operation Permit No: F097-5572-00057
Operation Permit Issuance Date: July 23rd, 1997
Minor Permit Revision No: 097-12379-00057
Permit Reviewer: Kevin Leone

The Office of Air Management (OAM) has reviewed a Minor Permit Revision application from Ertel Manufacturing Division, Dyna Gear relating to the operation of a Grey Iron Foundry.

History

On June 14th, 2000, Ertel Manufacturing Division, Dyna Gear, submitted an application to the OAM requesting changes to their existing permit to add one (1) Hydro Blast mop water evaporator, identified as F-8 with a maximum evaporation rate of 30 gal/hr, and venting to S-7. Ertel Manufacturing Division, Dyna Gear was issued a FESOP permit on July 23rd, 1997.

Existing Approvals

The source was issued a FESOP permit on July 23rd, 1997.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (dcfm)	Temperature (°F)
S-7	Mop Water Evaporator	24'	10''	TBD	212

Recommendation

The staff recommends to the Commissioner that the minor permit revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant.

An application for the purposes of this review was received on June 14th, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of the Mop Water Evaporator

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA." The PTE for EU-F-8 is:

Pollutant	Potential Emissions (tons/year)
PM	
PM-10	
SO ₂	
VOC	47.15
CO	
NO _x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See Appendix A for detailed emission calculations

HAP	Potential Emissions (tons/year)
Individual HAP	0
Combination HAP	0

(a) The potential emissions of VOC's are limited to less than 25 tons per year. Pursuant to 326 IAC 2-8-11.1(d)(5), the construction of the mop water evaporator is a minor source modification because the source is limiting the operating hours of the mop water evaporator to 4,645 hours per year, or 2,322 hours semi-annually. Therefore, the mop water evaporator will emit less than 25 tons per year of VOC. The source requested to limit their operating hours as a means to stay under the 25 ton limit. The ERMD has determined that this limit can be an effective means of accurately limiting VOC for this facility.

Limited Potential to Emit of the Mop Water Evaporator

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Mop Water Evaporator				less than 25 tons			
Total Emissions				less than 25 tons			

	Compliance With FESOP Limitations (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	СО	NO _x	HAPs
Electric Arc Furnace, Electric Arc Furnace, Sanitary Baghouse)				1.16			
Pouring Line				29.93			
Shot Blasting				0.0			
Tumbleblast Machine				0.0			
Mop Water Evaporator				less than 25 tons			
Total Emissions				56.09			

The increase in VOC's from the mop water evaporator will not effect this source's FESOP status; there is no need to adjust existing limits.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) is a precursor for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

Federal rule applicability will not be affected by this minor permit revision.

- 1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the mop water evaporator.
- 2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to the mop water evaporator.

State Rule Applicability - Entire Source

State rule applicability will not be affected by this minor permit modification.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

Since this type of operation is one of the twenty-eight (28) listed sources under 326 IAC 2-2 Since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The mop water evaporator, identified as EU-F8, was installed after January 1st of 1980 and this facility has a potential VOC emission of greater than 25 tons per year; thus, IAC 8-1-6 would apply to this facility. In order to keep this facility out of IAC 8-1-6, the VOC emissions have been limited to less than 25 tons per year.

Conclusion

The operation of this Grey Iron Foundry shall be subject to the conditions of the attached proposed Minor Permit Revision 097-12379-00057.

As a result of this Minor Permit Revision, the following changes have been made to the FESOP (strikeout indicates deleted language, and new language is bolded);

The title page of the FESOP permit has an additional box added to identify the permit modification. It appears as follows:

First Minor Permit Revision: 097-12379-00057	Affected Pages: 8,41,42,46
Issued by:	Issuance Date:
Mona A. Salem, Chief Operating Officer Department of Public Works, City of Indianapolis	

1) The following emission unit was added to section A.2:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

- (g) One (1) mop water evaporator, identified as EU-F-8. The mop water evaporator has a maximum capacity of 30 gal/hr, with no control equipment, and exhausts to stack F-7.
- 2) The following section for emission unit F-8 was added:

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions:

One (1) mop water evaporator, identified as EU-F-8. The mop water evaporator has a maximum capacity of 30 gal/hr, with no control equipment, and exhausts to stack F-7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compound Rules, New Facilities [326 IAC 2-8-11.1] [326 IAC 8-1-6]

The allowable VOC emissions from the mop water evaporator have been limited to less than 25 tons per year, thus 326 IAC 8-1-6 is not applicable. This will be done by limiting the operating hours of the mop water evaporator to 4,645 hours per year.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

D.8.3 Volatile Organic Compounds (VOC)

Compliance with condition D.8.1 shall be determined based on semi-annual mop water evaporator hours of operation.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.8.4 Record Keeping Requirements

- (a) To document compliance with Condition D.8.1 and D.8.3, the Permittee shall maintain a log of Semi-annual hours of operation for the mop water evaporator.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.8.5 Reporting Requirements

A semi-annual summary of the information to document compliance with condition D.8.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported.

3) The following FESOP Semi-Annual Report was added:

Page 6of 6 097-12379-00057

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Ertel Manufacturing Division, Dyna Gear

Source Address: 2045 Dr. Andrew J. Brown Ave. Mailing Address: 2045 Dr. Andrew J. Brown Ave.

FESOP No.: F097-5572-00057 Facility: Mop Water Evaporator

Parameter: Volatile Organic Compound Emissions

Limit: 4,645 hours of operation per year. This equates to less than 25 tons emission of VOC

per year for the mop water evaporator (EU-F-8).

	Column 1	Column 2	Column 1 + Column 2
Emission Unit	Hours of operation last 6 months	Hours of operation previous 6 months	12 Month Total
EU-F-7			

9No deviation occurred in this quarter.

9	Deviation/s occurred in this quarter.			
	Deviation has been reported on:			
Submitte	ed by:			
Title / Po	osition:			
Signature	e:			
Date:				
Phone:				

Indiana Department of Environmental Management Office of Air Management and Indianapolis Environmental Resources Management Division

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Existing Approvals

The source was issued a FESOP permit on July 23rd, 1997.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (dcfm)	Temperature (°F)
S-7	Mop Water Evaporator	24'	10''	TBD	212

Recommendation

The staff recommends to the Commissioner that the minor permit revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant.

An application for the purposes of this review was received on June 14th, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of the Mop Water Evaporator

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Pollutant	Potential Emissions (tons/year)
PM	
PM-10	
SO ₂	
VOC	47.15
CO	
NO _x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See Appendix A for detailed emission calculations

HAP	Potential Emissions (tons/year)
Individual HAP	0
Combination HAP	0

(a) The potential emissions of VOC's are limited to less than 25 tons per year. Pursuant to 326 IAC 2-8-11.1(d)(5), the construction of the mop water evaporator is a minor source modification because the source is limiting the operating hours of the mop water evaporator to 4,645 hours per year, or 2,322 hours semi-annually. Therefore, the mop water evaporator will emit less than 25 tons per year of VOC. The source requested to limit their operating hours as a means to stay under the 25 ton limit. The ERMD has determined that this limit can be an effective means of accurately limiting VOC for this facility.

Limited Potential to Emit of the Mop Water Evaporator

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

		Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Mop Water Evaporator				less than 25 tons			
Total Emissions				less than 25 tons			

		Compliance With FESOP Limitations (tons/year)					
Process/facility	PM	PM-10	SO ₂	VOC	СО	NO _x	HAPs
Electric Arc Furnace, Electric Arc Furnace, Sanitary Baghouse)				1.16			
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Shot Blasting				0.0			
Tumbleblast Machine				0.0			
Mop Water Evaporator				less than 25 tons			
Total Emissions				56.09			

The increase in VOC's from the mop water evaporator will not effect this source's FESOP status; there is no need to adjust existing limits.

County Attainment Status

The source is located in Marion County.

Pollutant	Status	
PM-10	attainment	
SO ₂	attainment	
NO_2	attainment	
Ozone	maintenance	
CO	attainment	
Lead	attainment	

(a) Volatile organic compounds (VOC) is a precursor for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

Federal rule applicability will not be affected by this minor permit revision.

- 1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the mop water evaporator.
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State Rule Applicability - Entire Source

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326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

Since this type of operation is one of the twenty-eight (28) listed sources under 326 IAC 2-2 Since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The mop water evaporator, identified as EU-F8, was installed after January 1st of 1980 and this facility has a potential VOC emission of greater than 25 tons per year; thus, IAC 8-1-6 would apply to this facility. In order to keep this facility out of IAC 8-1-6, the VOC emissions have been limited to less than 25 tons per year.

Conclusion

The operation of this Grey Iron Foundry shall be subject to the conditions of the attached proposed Minor Permit Revision 097-12379-00057.

As a result of this Minor Permit Revision, the following changes have been made to the FESOP (strikeout indicates deleted language, and new language is bolded);

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Issued by:	Issuance Date:
Mona A. Salem, Chief Operating Officer Department of Public Works, City of Indianapolis	

1) The following emission unit was added to section A.2:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

- (g) One (1) mop water evaporator, identified as EU-F-8. The mop water evaporator has a maximum capacity of 30 gal/hr, with no control equipment, and exhausts to stack F-7.
- 2) The following section for emission unit F-8 was added:

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions:

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(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Volatile Organic Compound Rules, New Facilities [326 IAC 2-8-11.1] [326 IAC 8-1-6]

The allowable VOC emissions from the mop water evaporator have been limited to less than 25 tons per year, thus 326 IAC 8-1-6 is not applicable. This will be done by limiting the operating hours of the mop water evaporator to 4,645 hours per year.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

D.8.3 Volatile Organic Compounds (VOC)

Compliance with condition D.8.1 shall be determined based on semi-annual mop water evaporator hours of operation.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.8.4 Record Keeping Requirements

- (a) To document compliance with Condition D.8.1 and D.8.3, the Permittee shall maintain a log of Semi-annual hours of operation for the mop water evaporator.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.8.5 Reporting Requirements

A semi-annual summary of the information to document compliance with condition D.8.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported.

3) The following FESOP Semi-Annual Report was added:

Page 6of 6 097-12379-00057

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Ertel Manufacturing Division, Dyna Gear

Source Address: 2045 Dr. Andrew J. Brown Ave. Mailing Address: 2045 Dr. Andrew J. Brown Ave.

FESOP No.: F097-5572-00057 Facility: Mop Water Evaporator

Parameter: Volatile Organic Compound Emissions

Limit: 4,645 hours of operation per year. This equates to less than 25 tons emission of VOC

per year for the mop water evaporator (EU-F-8).

	Column 1	Column 2	Column 1 + Column 2
Emission Unit	Hours of operation last 6 months	Hours of operation previous 6 months	12 Month Total
EU-F-7			

9No deviation occurred in this quarter.

9	Deviation/s occurred in this quarter.				
	Deviation has been reported on:				
Submitt	ed by:				
Title / P	osition:				
Signatu	re:				
Date:					
Phone:					